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January 15, 2024

VIA ECF

Honorable Joseph A. Marutollo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: JDH Unlimited Inc. v. APKZ Medical, Inc. et al
Civil Action No. 21-cv-03118-WFK-JAM

Dear Judge Marutollo:

Pursuant to Your Honor's text order dated December 22, 2023, please accept this letter as the parties' joint status report. In light of the Second Circuit Court of Appeals' Order vacating Judge Kuntz's Order Denying Defendant Jessica Rose Koehler's Motion to Vacate Default Judgment (the "Motion"), the parties propose the following briefing order on the Motion:

Plaintiff shall file its opposition to the Motion by February 20, 2024
Defendant shall file her reply by March 5, 2024

Respectfully submitted,
/s/ Thomas R. Dominczyk
Thomas R. Dominczyk
Attorney for Plaintiff

/s/ Frederic Robert Abramson
Frederic Robert Abramson
Attorney for Defendant
Jessica Rose Koehler